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HITACHI AMERICA, LTD.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

CASE NO.: 3:07-cv-05944-SC

MDL NO.: 1917

This Document Relates To:

*All Actions.*

DECLARATION OF PATRICK BARRETT  
IN SUPPORT OF HITACHI AMERICA,  
LTD.'S MOTION FOR PARTIAL  
SUMMARY JUDGMENT ON DUE  
PROCESS GROUNDS

1 I, Patrick Barrett, hereby declare:

2 1. I am over the age of eighteen, and am not a party to this action.

3 2. I am Senior Vice President, General Counsel at Hitachi America, Ltd. ("HAL"). I am  
4 authorized to make this declaration on behalf of HAL. I am informed and believe that the matters  
5 stated in this declaration are true, and if called, could and would testify competently to them.

6 3. HAL is a New York corporation with its principal place of business at 50 Prospect  
7 Avenue, Tarrytown, New York 10591.

8 4. HAL never manufactured cathode ray tubes ("CRTs"). Prior to April 1998, HAL  
9 sold CRTs to CRT Product manufacturing facilities. HAL did not sell CRTs to consumers because  
10 CRTs are not a standalone product. HAL did not manufacture CRT Products in the United States.

11 5. Based on the information reasonably available to HAL today, no officer or director of  
12 HAL resides in Arizona, Florida, Massachusetts, Minnesota, Mississippi, Nebraska, Nevada, New  
13 Mexico, or Wisconsin, or did so during the Relevant Period.

14 6. HAL has never held any formal meetings of its directors or its shareholder in  
15 Arizona, Florida, Illinois, Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, Nevada,  
16 New Mexico, North Carolina, or Wisconsin.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed on the 6th  
18 day of November, 2014 in Tarrytown, New York.

19 Patrick J. Barrett  
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